

United States District Court  
Southern District of Texas

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

JUN 14 2015

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Case Number:

M-15-0972-M

Mauricio Sanchez-Vargas  
A206 693 632PRINCIPAL  
YOB: 1995

Mexico

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 13, 2015 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Ivonne Guzman-Vega, citizen and national of Mexico, and Raquel Noemi Giron-Chicas, citizen and national of El Salvador, and nine (9) other undocumented aliens for a total of eleven (11) who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport by foot said aliens in furtherance of such violation of law within the United States, that is, from a location in Rio Grande City, Texas to the point of arrest in Rio Grande City, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On June 13, 2014, Border Patrol Agent M. Medrano, operating a Scope Truck, relayed he had observed a group of 12 people crossing through some open fields in Shufford's Farms near Rio Grande City, Texas. Shufford's Farms is an area commonly used to smuggled illegal aliens. Agent Medrano assisted agents from the Horse Patrol in finding where the group of 12 had hunkered down in the brush. When Agent Matthews from the Horse Patrol identified himself as a U.S. Border Patrol Agent, the group scattered and hid from the agents.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

J. Ibarra Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

June 14, 2015

Date

4:04 pm at

McAllen, Texas

City and State

Peter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-15-0972 -M**

**RE: Mauricio Sanchez-Vargas**

**A206 693 632**

One subject, later identified as Mauricio SANCHEZ-Vargas, separated from the group and ran east into the open fields as Agent J. Villarreal pursued him on horseback. While SANCHEZ ran from agents he simultaneously removed his shirt, something commonly done when smugglers are planning on jumping back into the Rio Grande River to avoid apprehension. Jumping into the Rio Grande River, after running for a prolonged period of time can result in drowning, so smugglers take precautions by removing as much clothing as possible before jumping into the river. Smuggled aliens rarely have the presence of mind to remove clothing when fleeing from law enforcement.

Additionally, Agent A. Villarreal saw SANCHEZ toss something as he was pursuing him. SANCHEZ eventually gave up running and surrendered. After Agent Villarreal apprehended SANCHEZ, he returned to look for what SANCHEZ had tossed. Agent Villarreal found a cell phone in the brush near the arrest point, to which SANCHEZ claimed ownership. SANCHEZ admitted to being in the United States illegally.

The Horse Patrol Unit continued to search the area where the group scattered and found 11 people hiding in the brush. All 11 admitted to being illegally in the United States.

SANCHEZ and the other 11 illegal aliens were transported to the Rio Grande City Border Patrol Station for processing.

**PRINCIPAL'S STATEMENT:**

Mauricio SANCHEZ-Vargas was read his rights. He stated he was willing to provide a statement without the presence of an attorney.

SANCHEZ, a citizen of Mexico, stated he worked as a foot guide in the past for two months before he was caught with a group of 3 smuggled aliens. His normal group size at the time was between 5 and 10. On this occasion, according to SANCHEZ, he was not smuggling. Another man who he knows as El Chuky was the guide, and El Chuky gave him a phone to call an unknown person when the group arrived at a predetermined location.

**MATERIAL WITNESSES' STATEMENTS:**

Both material witnesses were read their rights. Both stated they were willing to provide a statement without the presence of an attorney.

1- Ivonne Guzman-Vega, a citizen of Mexico, stated she was charged \$1,500 (USD) to be smuggled into the United States. She was part of a group of 12 that illegally crossed the Rio Grande River. According to Guzman, the foot guide crossed the river with them. On the Mexican side of the river, Guzman saw SANCHEZ smoking marijuana with the people who were going to raft them across the river. One of the rafters also told the group of smuggled aliens that SANCHEZ would be their foot guide.

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After crossing the river, SANCHEZ told the group what land marks they were going to encounter and in what order they would encounter them. He then told them where they would eventually be picked up. While on the trail, SANCHEZ heard a noise and told the group to run back to the river. Guzman identified SANCHEZ in a photo lineup as the foot guide for her group.

2- Raquel Noemi Giron-Chicas, a citizen of El Salvador, claimed she was charged \$1,500 (USD) to be smuggled into the United States. Before crossing the Rio Grande River, a smuggler in Mexico pointed to SANCHEZ and told the group that SANCHEZ would be leading them. Giron stated that SANCHEZ told the group that someone was on their way to pick them up. According to Giron, SANCHEZ was in front of the group before they were caught. Giron identified SANCHEZ in a photo lineup as the group's foot guide.